



# COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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September 19, 2014

Gina McCarthy, EPA Administrator  
USEPA Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 1101A  
Washington, DC 20460

RE: Federal Promulgation of Washington State Water Quality Standards

Dear Administrator McCarthy:

On behalf of the Columbia River Inter-Tribal Fish Commission's (CRITFC) member tribes — the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes and Bands of the Yakama Nation, and the Nez Perce Tribe — I been directed to express our concern over the continued delay in Washington State to revise its inadequate water quality standards. As stewards of the Columbia River, CRITFC supports the implementation of regulations and programs that improve water quality to a level sufficient to protect our watershed from the harmful impacts of waterborne pollutants. CRITFC strongly endorses the position of Region 10 Administrator Dennis McLerran who recognizes that more stringent water quality standards are necessary than those currently proposed in Washington State to meet Clean Water Act requirements to protect the environment and the health of all people living in the region.

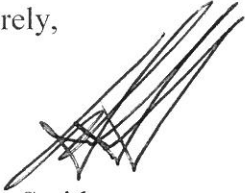
With their much higher fish consumption rate, our tribal members are subjected to far greater hazards from contaminants in our water than the general public. While the human health criteria recently proposed by Governor Inslee recommends a higher fish consumption rate for Washington State, the cancer risk level would actually increase from 1 in 1,000,000 to 10 in 1,000,000. The Governor's proposal puts tribal members at a heightened risk of exposure to unsafe bioaccumulative toxic chemicals and does not safeguard the unique cultural, economic, and subsistence relationship of our tribes to treaty guaranteed fishery resources.

CRITFC suggests that EPA adhere to the recommendations contained in the National Environmental Justice Advisory Council report "Fish Consumption and Environmental Justice, November 2002" which calls for EPA to improve the quality of aquatic ecosystems and protect the health of fish consuming people. The recommendations include taking stronger steps to prevent and reduce the release of persistent, bioaccumulative toxics into the nation's aquatic resources by making full use of the authority of federal environmental laws and the trust responsibility of the Agency. Federal promulgation of water quality standards in Washington State is an example of how

EPA's authority could be better asserted. To this end, CRITFC respectfully requests that EPA move ahead with federal promulgation of water quality standards in Washington State without further delay.

CRITFC and EPA have built a long-standing relationship based upon a shared vision of clean water for all people who inhabit the Columbia River Basin. We commend the actions that Administrator McLerran has taken in pushing for strong standards in Oregon and in delivering this message to other states in the region as well. If you would like to further discuss how our organization can work with EPA on this issue, please contact me or Dianne Barton at 503-238-0667.

Sincerely,

A handwritten signature in black ink, appearing to be 'Carlos Smith', written over a series of diagonal lines.

Carlos Smith  
Chairman

Cc: Dennis McLerran, EPA Region 10 Administrator  
Lisa Feldt, Acting Deputy Administrator  
Ken Kopocis, Acting Assistant Administrator for Office of Water